

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

THOMAS A. COLTHURST (CABN 99493)  
Chief, Criminal Division

MICHAEL G. LAGRAMA (CABN 252734)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7241  
Fax: (415) 436-7234  
Michael.Lagrama@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. 3:20-CR-00114-CRB
	)	
Plaintiff,	)	STIPULATION TO EXCLUDE TIME UNDER
	)	SPEEDY TRIAL ACT; <del>PROPOSED</del> ORDER
v.	)	
	)	
JACKSON TORRES,	)	
	)	
Defendant.	)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Jackson Torres, that time be excluded under the Speedy Trial Act between November 8, 2023 and December 8, 2023.

A change of plea and sentencing hearing was set for November 8, 2023. So that the parties can finalize the terms of the plea agreement, that hearing has been continued to December 8, 2023. The government and counsel for Mr. Torres agree that time should be excluded from November 8, 2023 through December 8, 2023 under the Speedy Trial Act to allow for effective preparation of counsel, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). Particularly, exclusion of time will allow defense counsel to continue reviewing discovery materials produced by the government, consult with Mr. Torres, and engage in further discussions with the government to finalize STIPULATION TO EXCLUDE TIME; ~~PROPOSED~~ ORDER (Case No. 3:20-cr-00114CRB) v. 7/10/2018

a plea agreement in this case. The parties further stipulate and agree that the ends of justice served by excluding the time between November 8 and December 8, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. *Id.* § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for Mr. Torres to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: November 13, 2023

/s/ Michael G. Lagrama

MICHAEL G. LAGRAMA

Assistant United States Attorney

DATED: November 13, 2023

/s/ Elizabeth M. Falk

ELIZABETH M. FALK

Assistant Federal Public Defender

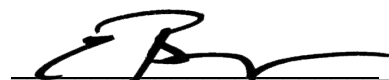
Counsel for Defendant Jackson Torres

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the parties' stipulation, the Court finds that failing to exclude time under the Speedy Trial Act would unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between November 8, 2023 and December 8, 2023 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time between November 8, 2023 and December 8, 2023 shall be excluded from computation under the Speedy Trial Act. *Id.* § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: November 15, 2023

  
CHARLES R. BREYER  
United States District Judge